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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**JOINT STATUS REPORT ON
DISCOVERY FOR APRIL 22, 2025
DISCOVERY MANAGEMENT
CONFERENCE**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Discovery Management Order (“DMO”) No. 2 (ECF 606), the Personal Injury (“PI”) and School District and Local Government Entity (“SD”) Plaintiffs, State Attorneys General (“State AGs”), and Defendants submit this agenda and joint statement in advance of the April 22, 2025, Discovery Management Conference (“DMC”).

I. Undisputed Administrative Issues the Parties Would Like to Bring to the Court’s Attention Which Do Not Require Court Action

A. Meta v. State AGs

1. Stipulation and Amended Complaint re States Transitioning to COPPA-Only

Seven States are negotiating the terms of the dismissal of their state law claims against Meta, which would leave only their COPPA claims: Arizona, Hawai’i, Ohio, Oregon, Maine, Rhode Island, and Washington. The Parties are hoping to finalize their agreement by the April 22, 2025 DMC, and will ask the District Court to enter it.

2. Update on Missouri Dismissal

In the March 14 DMC Statement, Missouri reconfirmed that it “has agreed in principle to dismiss its case subject to the Parties’ memorializing their agreement in writing, as previously reported to the Court.” ECF 1767 at 2. The Parties will provide an update on Missouri’s dismissal at the April 22, 2025 DMC.

3. Anticipated Request for Extension of AG-Specific Expert Deadlines

The State AGs and Meta are discussing an anticipated request to extend the expert deadlines for certain AG-specific expert reports relating to (1) remedies for consumer protection act and COPPA violations, (2) liability under COPPA, and (3) liability under consumer protection acts. The Parties hope to finalize any joint request for an extension by the April CMC.

II. Administrative Issues that Are Disputed or Require Court Action

A. State AGs v. Mindshare, Inc.: Request for leave to reissue subpoena served on Mindshare, Inc.

III. Ripe Disputes for Which Joint Letter-Briefs (“JLBs”) Have Already Been Filed or Will Be Filed Imminently

A. Defendants v. PI Bellwethers

1. *M.G.* – Motion to compel deposition testimony of fact witnesses who failed to appear. This dispute will be ripe for this Court’s resolution as soon as an uncontested motion to transfer it to this Court’s jurisdiction is granted. Defendants have filed a Motion to Compel Foreign Subpoena Enforcement Against Non-Parties Dora and Juana Rodriguez in the United States District Court for the Eastern District of Tennessee, which is the district in which compliance with the deposition subpoenas was required. Contemporaneous with that Motion to Compel, Defendants filed a Motion to Transfer the Motion to Compel to this Court, which is the Court from which the subpoenas were issued. Plaintiff and Defendants agree that whether these witnesses should be compelled to sit for their depositions should be resolved by this Court.
2. *Mullen* – Deposition of fact witness located in Switzerland (Joint Letter Brief filed on April 3, 2025 (ECF 1829))

B. Meta v. State AGs

1. Joint Letter Brief re Meta’s 30(b)(6) Notice to Consumer Protection States (filed March 28, 2025) (ECF 1807) (awaiting decision without argument)
2. States’ R&Os to Meta’s RFPs re Teen Accounts (Joint Letter Brief to be filed on April 18, 2025)

C. Disputes Involving Third Parties

1. Meta’s Administrative Motion for Leave to File Supplemental Briefing on Former Employees’ Objections to Meta’s Document Subpoenas in Lieu of Proposed Order (filed March 31, 2025, ECF 1815) and Former Employees’ Opposition/Response (filed April 4, 2025, ECF 1837) (awaiting decision without argument)

IV. Unripe Disputes

A. Defendants v. PI Bellwethers

1. Dispute regarding productions from additional accounts/sources for all personal injury bellwether cases
2. *Craig* motion to Compel Testimony from former foster parents¹
3. *D'Orazio* inability to depose key treater Citrino
4. *D'Orazio* disputes regarding deleted text messages
5. *M.G.* discovery disputes arising from deposition testimony
6. *M.G.* dispute regarding appropriate remedy if Defendants are unable to depose fact witnesses with relevant knowledge
7. *Krekeler* dispute regarding further discovery into Plaintiff's eating disorder relapse
8. *McNeal* inability to depose key treater and third party witnesses
9. *Mullen* motion to compel WETA production from *Early Warnings, Youth Mental Health Crisis* Special (PBS News Hour Feb 14, 2023)
10. *Mullen* dispute regarding production of additional medical records/communications
11. *Mullen* dispute regarding production of Snapchat messages
12. *Mullen* dispute regarding production of journals/diaries/essays
13. *Mullen* dispute regarding preservation/spoliation of devices
14. *Mullen* dispute regarding production of mother's documents

B. Defendants v. SD Bellwethers

1. Jordan, Tucson, and Hillsborough SD's belated amended responses to Rog 1
2. Tucson SD's production of documents relied on by 30(b)(6) deponent
3. Irvington SD's outstanding production of certain documents

¹ This motion to compel is currently pending in the Eastern District of Kentucky.

4. Irvington SD's deficient privilege log
5. Irvington SD's deficient responses to certain interrogatories
6. Hillsborough SD's outstanding production of certain documents

C. All Plaintiffs v. All Defendants²

1. Shared experts among PI/SD and State AG Plaintiffs and related multi-Defendant confidentiality issues
2. Plaintiffs' ROGs to Defendants relating to Plaintiff-specific affirmative defenses (served on April 4, 2025)

D. PI/SD Plaintiffs v. All Defendants

1. Plaintiffs' bellwether-specific ROGs and RFAs to Defendants (served on March 5, 2025)

E. Meta v. State AGs

1. Meta's R&Os to the State AGs' RFPs and ROGs related to financial and user data and information.
2. State AGs' supplemental responses to Meta's First and Second Sets of ROGs
3. Meta's R&Os to State AGs' First Set of RFAs and Plaintiffs' Third Set of RFAs and Sixth Set of ROGs [briefing deadline extended by agreement of the Parties to April 25, 2025]
4. State AGs' 30(b)(6) Deposition Notice to Meta
5. Meta's R&Os to State AGs' Fourth Set of RFPs
6. Meta's response to State AGs' RFP No. 102 and proposed order
7. Production issue regarding underage user reports (potentially missing data)

² Defendants reserve their right to argue that Plaintiffs waived their right to move to compel further responses to certain of the discovery for which Plaintiffs have identified "unripe" disputes in this Joint Statement, due to the passage of the April 11, 2025 deadline to brief disputes as to discovery that closed as of April 4, 2025. *See* Local Rule 37-3. Plaintiffs similarly reserve their right to make this same argument with respect to Defendants' waiver.

8. Draft stipulation to amend clawback order to address certain information States contend are statutorily protected

F. Snap v. PI/SD Plaintiffs

1. Plaintiffs' request that Snap produce a witness knowledgeable about documents contained in Senthil Sundaram's custodial file

G. TikTok v. PI/SD Plaintiffs

1. Plaintiffs' Fourth and Sixth Set of Interrogatories

H. Disputes Involving Third Parties

1. Meta v. Plaintiffs: Dispute re deposition of former Meta employee Sarah Wynn-Williams
2. Meta v. Plaintiffs: Work product objections to production of communications between MDL Plaintiffs' counsel and former employee Frances Haugen in response to Meta's subpoena
3. Meta v. Former Employee Frances Haugen: Joint Letter Brief re objections to production of documents by former employee Frances Haugen in response to Meta's document subpoena
4. Meta v. Plaintiffs: Dispute re deposition of former employee Frances Haugen

1 Respectfully submitted,

2 DATED: April 16, 2025

By: /s/ Previn Warren

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ATTESTATION

I, Previn Warren, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: April 16, 2025

By: /s/ Previn Warren